

### **REMARKS**

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 16-24 are presently active, Claims 1-15 have been previously canceled without prejudice or disclaimer. The present Amendment amends Claims 16 and 18 without introducing any new matter.

The April 23, 2007 Office Action rejected Claims 16-17, 19 and 23-24 under 35 U.S.C. § 103(a) as unpatentable over Ream (U.S. Patent No. 6,363,228) in view of Ito (Japanese Patent Application No. JP 11-344875). Claims 18 and 20-22 were rejected under 35 U.S.C. § 103(a) as unpatentable over Ream in view of Ito and further in view of Kato (Japanese Patent Application No. JP 11-24498).

The September 12, 2007 Advisory Action upheld the rejections of the pending Office Action and submitted a machine translation of the reference Ito.

In response, Claims 16 and 18 are amended. Claim 16 is amended to further recite “wherein the unique correction data includes an average velocity value of a rotation of the transfer belt based on multiple velocity measurements made along the rotation of the transfer belt.” Dependent Claim 18 is amended to adapt the features to the new claim language of independent Claim 16. These features find non-limiting support in Applicants’ disclosure as originally filed, for example at least at p. 8, ll. 1-5, ll. 15-20, and with reference to Fig. 3. No new matter has been added.

In response to the rejections of Claims 16-24 under 35 U.S.C. § 103(a), Applicants respectfully request reconsideration of these rejections, and traverse the rejections, as discussed next.

Briefly recapitulating, Claim 16 is directed to an image forming apparatus for correcting color difference and position difference of the transfer belt unit. The image

forming apparatus includes, *inter alia*: a controller configured to read the unique correction data stored in a first memory contained in the transfer belt unit connected to a main body of the image forming apparatus, and transfer the unique correction data from the first memory to a second memory contained in the main body of the image forming apparatus; wherein the unique correction data includes *an average velocity value of a rotation of the transfer belt based on multiple velocity measurements made along the rotation of the transfer belt*.

Turning now to the applied references, Ream describes a system for registration a correction for a transfer belt, wherein critical data is measured at time of the manufacture of the transfer belt 20, and stored into a memory of a subassembly 15. (Ream, Abstract, col. 3, ll. 51-56, Fig. 1.) Ream teaches that a surface velocity profile can be stored in the memory. (Ream, col. 3, ll. 58-59.) To measure the surface velocity, Ream uses two optical detection sensors 70, 71 that are arranged close to the belt 20, and these sensor are capable of detecting a home position indicator 75 on the belt 20, such as a hole that is punched through the belt. (Ream, col. 3, l. 15-31, Figs. 1, 2 and 7.) Therefore, Ream's subassembly 15 can only measure a time it takes for the indicator 75 to pass from one sensor to the other. Accordingly, Ream fails to teach Applicants' Claim 16 feature "the unique correction data includes an average velocity value of a rotation of the transfer belt based on multiple velocity measurements made along the rotation of the transfer belt."

The reference Ito is directed to an image forming device wherein a memory 25 stores conditions of the transfer body unit 5. Ito explains that the conditions may include information on the geometric distance of the rollers of the transfer body unit, or a belt revolution period. (Ito, ¶¶ [0004], [0010].) However, the cited passages of Ito also fail to teach Applicants' Claim 16 feature "the unique correction data includes an average velocity value of a rotation of the transfer belt based on multiple velocity measurements made along a

rotation of the transfer belt.” A mere revolution period, as taught by Ito, is not an average velocity based on multiple measurements, as required by Applicants’ Claim 16.

The reference Kato, used by the pending Office Action to form a 35 U.S.C. § 103(a) rejection, also fails to remedy the deficiencies of Ream and/or Kato, as next discussed.

Kato’s describes an image forming device wherein the traveling speed of the belt is measured so as to control the speed of the belt by a feedback control. (Kato, Abstract.) Kato uses sensor 19 to detect a marker 18a or multiple markers 18a (Fig. 11) on a belt 18 to measure a speed. (Kato, Figs. 1, 11, ¶ [0031]) With respect to Fig. 11 and ¶ [0043]-[0044], Kato explains that discrete values of belt speeds along the belt can be measured, and these values can be forwarded to a PID controller for a real-time feedback control of the belt speed. (See also Kato, Fig. 10, showing the discretely measured speeds and the set value of the reference speed  $V_{ref}$ .) Kato clearly never calculates an average value of these speeds, as required by Applicants’ Claim 16. Kato’s image forming device also teaches away from such a feature since the multiple marks 18a along the belt 18 are provided for a real-time speed control during one revolution of the belt.

Therefore, even if the combination of Ream, Ito, and/or Kato is assumed to be proper, the cited passages of the combination fail to teach every element of Applicants’ Claim 16. Specifically, the cited passages of combination fail to teach the unique correction data including an average velocity value of a rotation of the transfer belt based on multiple velocity measurements made along the rotation of the transfer belt. Accordingly, Applicants respectfully traverse, and request reconsideration of, the rejection based on Ream, Ito, and Kato.<sup>1</sup>

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<sup>1</sup> See MPEP 2142 stating, as one of the three “basic criteria [that] must be met” in order to establish a *prima facie* case of obviousness, that “the prior art reference (or references when combined) must teach or suggest all the claim limitations,” (emphasis added). See also MPEP 2143.03: “All words in a claim must be considered in judging the patentability of that claim against the prior art.”

Accordingly, independent Claim 16 patentably distinguishes over the applied references. Since Claims 17-24 are dependent directly or indirectly from Claim 16, substantially the same arguments set forth above also apply to these dependent claims. Therefore, the rejections of Claims 16-24 are believed to be overcome.

Consequently, in light of the above discussions, Applicants respectfully request withdrawal of the rejection of Claims 16-24. The application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested. Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Customer Number

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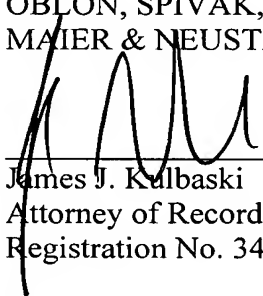
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(OSMMN 06/04)

Respectfully submitted,

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